

**FILED**

**FEB 9 - 2017**

Clerk, U.S. District Court  
Texas Eastern

IN THE UNITED STATES OF AMERICA  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA §  
v. §  
AMANDA LYNN MOLLISON (1) §  
JUSTIN CHADWICK BROWN (2) §

No. 4:17cr 27

Judge Crowe

**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**Count One**

Violation: 18 U.S.C. § 371  
(Conspiracy to Possess Contraband in  
Prison)

**INTRODUCTION**

At all times material to this indictment:

1. The Collin County Jail in McKinney, Texas, Eastern District of Texas, was a Federal Bureau of Prisons administrative facility that housed federal inmates, including inmates who are pending trial in the Eastern District of Texas.

2. **Justin Chadwick Brown**, was a prisoner at the Collin County Jail.

3. On or about September 1, 2016, and continuing to October 15, 2016, in the Eastern District of Texas, **Amanda Lynn Mollison** and **Justin Chadwick Brown**, conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, agreeing to provide and posses

prohibited substances and contraband in a federal prison, in violation of 18 U.S.C. § 1791(a).

**MANNER AND MEANS**

4. It was part of the conspiracy that on or about October 5, 2016, **Amanda Lynn Mollison**, defendant, placed in the U.S. Mail a greeting card soaked in liquid methamphetamine to defendant **Justin Chadwick Brown**.

**OVERT ACTS**

5. In furtherance of the conspiracy, **Amanda Lynn Mollison**, and **Justin Chadwick Brown**, defendants, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Texas:

6. On or about September 30, 2016, **Justin Chadwick Brown**, placed a telephone call to **Amanda Lynn Mollison** from a recorded line at the Collin County Jail. During the telephone conversation, **Justin Chadwick Brown** asked **Amanda Lynn Mollison** “to work on his card tonight” because he “wants to get high”.

7. On or about October 4, 2016, defendant **Justin Chadwick Brown** placed a telephone call to **Amanda Lynn Mollison** from a recorded line at the Collin County Jail. During the telephone conversation, **Justin Chadwick Brown** asked defendant **Amanda Lynn Mollison** “if she did what he asked her to do”.

8. On or about October 5, 2016, **Justin Chadwick Brown** placed a telephone call to **Amanda Lynn Mollison** from a recorded line at the Collin County Jail. During the telephone conversation, **Justin Chadwick Brown** asked **Amanda Lynn Mollison** if

she mailed the card and she replied “yes”.

9. On or about October 11, 2016, Collin County Sheriff’s employees intercepted an envelope addressed to **Justin Chadwick Brown**. A greeting card was found inside the envelope. The greeting card and the envelope contained a detectible quantity of a methamphetamine.

On or about October 5, 2016, in the Eastern District of Texas, **Amanda Lynn Mollison** and **Justin Chadwick Brown**, defendants, conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, agreeing to provide and possess prohibited substances and contraband to an inmate in a federal prison, in violation of 18 U.S.C. § 1791(a) and (b).

All in violation of 18 U.S.C. § 371.

### **Count Two**

Violation: 18 U.S.C. § 1791(a)(1) and 2  
(Providing of Contraband in Prison and  
Aiding and Abetting)

On or about October 11, 2016, within the Eastern District of Texas, **Amanda Lynn Mollison**, defendant, knowingly, in violation of a statute, rule, and order issued under a statute, provided or attempted to provide, and aided and abetted and willfully caused the providing and attempted providing of prohibited objects, that is, a mixture or substance containing a detectible amount of methamphetamine to **Justin Chadwick Brown**, an inmate of Collin County Jail in McKinney, Texas.

In violation of 18 U.S.C. § 1791(a)(1) and 2.

**Count Three**

Violation: 18 U.S.C. § 1791(a)(2)  
(Possession of Contraband in Prison)

On or about October 11, 2016, within the Eastern District of Texas, **Justin Chadwick Brown**, defendant, being an inmate of the Collin County Jail in McKinney, Texas, knowingly possessed, obtained and attempted to possess and obtain, a prohibited object, to wit, a mixture or substance containing a detectible amount of methamphetamine.

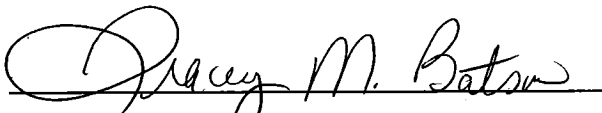
In violation of 18 U.S.C. § 1791(a)(2).

A TRUE BILL

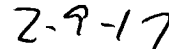


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GRAND JURY FOREPERSON

BRIT FEATHERSTON  
ACTING UNITED STATES ATTORNEY



TRACEY M. BATSON  
Assistant United States Attorney



\_\_\_\_\_  
Date

IN THE UNITED STATES OF AMERICA  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	No. 4:16CR _____
	§	Judge _____
AMANDA LYNN MOLLISON (1)	§	
JUSTIN CHADWICK BROWN (2)	§	

**Count One**

Violation: 18 U.S.C. § 371

Penalty: Imprisonment for a term of not more than five years; a fine not to exceed \$250,000.00; and supervised release of not more than three years.

Special Assessment: \$100.00

**Counts Two and Three**

Violation: 18 U.S.C. § 1791(a)(1), 1791(a)(2) and 2

Penalty: Imprisonment for a term of not more than 20 years; a fine not to exceed \$250,000.00; and supervised release of not more than three years.

Special Assessment: \$100.00